

### **REMARKS**

In response to the Office Action dated December 23, 2003, Applicants have further modified the claims. Applicants submit that these Remarks along with the accompanying Amendments to the Claims overcome the rejections set forth by the Examiner in the above referenced Office Action.

Applicant respectfully requests reconsideration of the prior art rejections set forth under 35 U.S.C. Sections 102 and 103. Applicants respectfully submit that the prior art references of record, whether considered alone, or in combination, fail to either teach or suggest Applicant's presently claimed invention.

More specifically, Applicants have amended the claims to more clearly recite the novel structure of the device. Applicants have previously attempted to describe the visual position of the invention's elements, and hope the amended claims make the invention clearer to the Examiner. Applicants have made use of the term "primary wall" to describe the four main side walls that form a rectangular shape, and embody the dimensions of almost all variations of the current invention. While package designers are at will to implement any shape of package, the most common shape is rectangular, and is the shape to which Applicant's invention is currently directed. The use of cut or other shaped corners (See Figure 2A of Applicant's disclosure for an example of cut and rounded corners) does not detract from the predominately rectangular shape of the device. ▽

Applicants have amended claims 1, 3, and 5 in order to more clearly disclose the

claimed shape of the device. The amended language of the claims reads as “a housing containing a semiconductor element, said housing having primary side walls.” This arrangement describes a rectangular-shaped package with four primary sidewalls, such that they are divided into 2 sets of 2 primary sidewalls. Within each set, the two sidewalls make up opposite ends of the rectangular shape, such that the two sidewalls are parallel to each other. The two sidewalls in one of the sets are perpendicular to the two side walls in the other set, hence describing a rectangular shape. This description allows for any number of secondary sidewalls that must be formed at the corners of the device. While these secondary sidewalls may detract ever so slightly from the overall rectangular shape of the device, simply extending each set of primary sidewalls beyond the secondary sidewalls until they intersect would in fact complete the rectangle.

Applicant's claim the layout of the positioning and attaching holes in relation to the structure described above. More specifically, the lines drawn through each set of holes, attaching and positioning, intersect substantially in the center of the device, and are skewed in relation to all four primary sidewalls. To put it another way, the lines drawn through each set of holes are neither perpendicular nor parallel to any one of the four primary sidewalls. *Arai* fails this test because when a line is drawn between the attaching holes in Figures 1 and 4 (described in Column 9, line 64 to Column 10, line 62), the resulting line would not be skewed in relation to the sidewalls, but would in fact be parallel to one of the sidewalls and be perpendicular to the other sidewall.

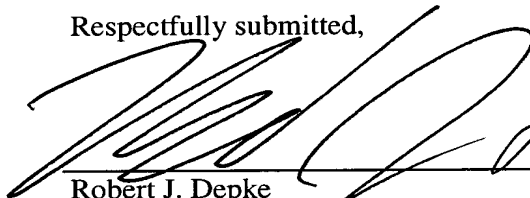
The traditional limitation of centering one of these holes, as disclosed in Figure 3 of

Applicant's invention and Figures 1 and 4 of the *Arai* reference, prevents the further miniaturization of the device by allowing for wasted space on the housing. The requirement of placing the hole in the center in the Prior Art was to make screw fastening torque uniform (See Applicant's disclosure, pg. 3). Applicant's have, however, invented a way to offset the holes from center and still maintain the integrity of the device.

Applicants submit that the references of record fail to teach or suggest such a structure. Accordingly, Applicants submit that all claims now stand in condition for allowance.

Respectfully submitted,

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